

Yacovone, Krista

From: John M. Hoffman <jmhoffman@ashland.com>
Sent: Monday, April 22, 2013 4:46 PM
To: Gorin, Jonathan
Cc: Carrie McGowan
Subject: RE: National Remedy Review Board - LCP
Attachments: LCP_NRRB.pdf

Hi Jon,
Attached below is the NRRB letter. Do you need the original?

Thanks
John

John Hoffman
Project Manager - Remediation
302 995-3233

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Environmental Health Safety & Product Regulatory
500 Hercules Road
Wilmington, DE 19808-1599

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From: "Gorin, Jonathan" <Gorin.Jonathan@epa.gov>
To: John M. Hoffman/RCWilm/NA/Herc@Ashland,
Date: 04/22/2013 09:00 AM
Subject: RE: National Remedy Review Board - LCP

Hey John, any luck on the letter?

From: John M. Hoffman [<mailto:jmhoffman@ashland.com>]
Sent: Tuesday, April 16, 2013 8:56 AM
To: Gorin, Jonathan
Subject: RE: National Remedy Review Board - LCP

thank you

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From: "Gorin, Jonathan" <Gorin.Jonathan@epa.gov>
To: John M. Hoffman/RCWilm/NA/Herc@Ashland,
Date: 04/16/2013 08:54 AM
Subject: RE: National Remedy Review Board - LCP

Absolutely, thanks

jon

From: John M. Hoffman [<mailto:jmhoffman@ashland.com>]
Sent: Tuesday, April 16, 2013 8:53 AM
To: Gorin, Jonathan
Subject: RE: National Remedy Review Board - LCP

Hi Jon,

I am talking to Carrie and Gary - at nine this morning. We will be discussing this - can you give me to tomorrow?

Thanks
John

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From: "Gorin, Jonathan" <Gorin.Jonathan@epa.gov>
To: John M. Hoffman/RCWilm/NA/Herc@Ashland,
Date: 04/16/2013 08:50 AM
Subject: RE: National Remedy Review Board - LCP

Hey John, I hate to be a pest about this, but could you let me know the status of the NRRB letter/e-mail?

Thanks, jon

From: John M. Hoffman [<mailto:jmhoffman@ashland.com>]
Sent: Monday, April 08, 2013 9:55 AM
To: Gorin, Jonathan
Cc: Carrie McGowan; DiPippo, Gary
Subject: RE: National Remedy Review Board - LCP

Thanks Jon. Let's discuss your two points tomorrow during the site visit. See you tomorrow.

Thanks
John

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From: "Gorin, Jonathan" <Gorin.Jonathan@epa.gov>
To: John M. Hoffman/RCWilm/NA/Herc@Ashland,
Cc: Carrie McGowan <Carrie.McGowan@ehs-support.com>, "DiPippo, Gary" <Gary.DiPippo@Cornerstoneeg.com>
Date: 04/08/2013 09:38 AM
Subject: RE: National Remedy Review Board - LCP

John, it's your letter so I have no comment on the draft. However, I'd like to make two points simply for clarification. 1) While 6 feet seems reasonable, EPA hasn't decided on the depth of treatment. And 2) In all cases, if a remedy fails to perform, as demonstrated during the action or a treatability study, an alternative approach would be selected. If there's a contingency in the ROD, that contingency is used, if there's not a contingency then a ROD amendment or an ESD is issued.

Thanks,
jon

From: John M. Hoffman [<mailto:jmhoffman@ashland.com>]
Sent: Monday, April 08, 2013 8:53 AM
To: Gorin, Jonathan
Cc: Carrie McGowan; DiPippo, Gary
Subject: Re: National Remedy Review Board - LCP

Hi Mark and Robin,

As we discussed several weeks ago, here is the draft language of the e-mail/and or letter (as you request) that will be sent that pertains to the draft ROD and NRRB at LCP. Please review and revise/change/edit as you see appropriate.

The Feasibility Study report for the LCP site in Linden, NJ is in draft form. This report utilized the conclusions of the Remedial Investigation (RI) and risk assessments (human health and ecological) as a basis to develop Remedial Action Objectives (RAOs) for the site, and these RAOs were used to evaluate remedial technologies and alternatives that met the RAOs. Detailed and comparative evaluations of the remedial alternatives were completed to meet the RAOs. While

IES/Ashland believes a containment-based remedy is the appropriate remedy for the site, we understand the SARA preference for treatment. At the LCP site, if treatment is to be implemented, further pre-design study would be necessary for confirmation. In this regard, we understand that the USEPA is considering a contingent ROD, which from the evaluations in the FS, the remedial alternative proposed for selection would consist of the following components:

- 1) Barrier wall installed around the perimeter of the site, including the upstream portion of South Branch Creek (or to be determined during design)
- 2) Amendment of soil with sulphur to six (6) feet in the areas shown to contain visible elemental mercury. This treatment will be contingent on the results of the treatability and field pilot study as defined in the FS, and agreed upon metrics for treatment efficacy. If the treatment is not effective, based upon the treatability and pilot studies, no amendments will be made prior to capping.
- 3) Sediments and low marsh surficial soils in the uncapped portion of South Branch Creek and the Northern Offsite Ditch will be excavated to bed materials, area restored (including wetlands restoration and mitigation in the same areas as applicable), and the excavated materials consolidated under the geosynthetic cap
- 4) Low permeability geosynthetic cap over the complete site within the barrier wall, with two feet of soil cap (vegetated)
- 5) Shallow groundwater recovery system to maintain a lower head inside the barrier wall as compared to the head outside the barrier wall
- 6) Buildings to be demolished and porous debris (concrete, masonry units) treated as in step 2 above, remaining portions of buildings crushed and left in place under the cap.
- 7) Steel from buildings to be recycled
- 8) Monitoring of deep groundwater
- 9) Establish a site-wide Deed Notice restricting use of the site to commercial/industrial uses

With the above components as the basis of the contingent ROD, IES would support the exemption from the peer review carried out by the National Remedy Review Board on the site's proposed cleanup decision.

Thanks
John

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Project Manager - Remediation
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From: "Gorin, Jonathan" <Gorin.Jonathan@epa.gov>
To: Carrie McGowan <Carrie.McGowan@ehs-support.com>, John M. Hoffman/RCWilm/NA/Herc@Ashland,
Date: 04/01/2013 01:26 PM
Subject: National Remedy Review Board - LCP

Hi John and Carrie, just a gentle reminder. I believe you were going to send me some comments on possibly exempting the LCP site from the above mentioned review.

Jon

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April 22, 2013

Mr. Jonathan Gorin
Remedial Project Manager
United States Environmental Protection Agency, Region II
290 Broadway
19th Floor
New York, New York 10007-1866

Subject: LCP Chemicals, Inc. Superfund Site (USEPA ID# NJD079303020)
National Remedy Review Board

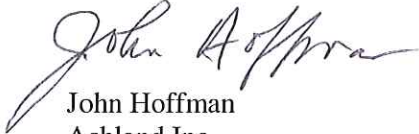
Dear Mr. Gorin:

The National Remedy Review Board (NRRB) would typically provide a peer review for sites at which the remedial action cost may exceed \$25,000,000. Remedial alternatives for the LCP Site include remedial actions that exceed this cost threshold for NRRB review. ISP Environmental Services, Inc. (ISPES) understands that the United States Environmental Protection Agency (USEPA) is, therefore, evaluating the need for peer review for the LCP site, and whether it would be reasonable to exempt the Site from the peer review process carried out by the NRRB.

The Feasibility Study (FS) report for the LCP Site is complete in draft form and is currently proceeding through the review process with the USEPA. ISPES believes that the FS report, in its final form when complete, will provide an objective, rational, and practicable basis for the USEPA to select a remedy. Assuming the USEPA selects a remedy consistent with the remedial action objectives and alternatives evaluations in the FS report, then ISPES would support an exemption from the peer review carried out by the NRRB on the Site's proposed cleanup decision. In so doing, IES reserves all of its rights during the remedy selection process, including recommending NRRB involvement, if remedy selection appears to be inconsistent with the FS report.

If you or your staff has any questions or comments, please do not hesitate to contact me at the letterhead address, by phone at (302) 995-3233, or by email at jmhoffman@ashland.com.

Sincerely,



John Hoffman
Ashland Inc.
Environmental Health Safety & Product Regulatory
Project Manager - Remediation

cc: M. Metcalf, Ashland Inc.
R. Lampkin, Ashland Inc.
G. DiPippo, Cornerstone Environmental Group
C. McGowan, EHS Support